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July 13, 2007
(PBW Project No. 1381)

VIA OVERNIGHT COURIER

Mr. Gary Miller
Superfund Division, Region 6 (6SF-AP)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: June 2007 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the modified Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) (collectively referred to as Respondents in the UAO and the Statement of Work (SOW) attached thereto). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
 - Subtask 6.3 – Soil sampling from five background locations within the City of Freeport right-of-way immediately south of Marlin Avenue was performed.
 - Subtask 6.5 – Phase 2 monitoring well development, groundwater sampling, water level measurement, and monitoring well elevation surveying activities were completed.
 - Acquisition of access to properties for collection of background soil samples (UAO Paragraph 72) – Attempts were made to obtain access to five remaining background soil sample locations within areas east of the east end of Marlin Avenue. We identified and contacted property owners within this area. As previously discussed with you, our requests for access to these properties were denied by the property owners. In our discussion on June 25, 2007, you



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approved collection of the remaining five background soil samples from within the City of Freeport right-of-way along Marlin Avenue. These samples were collected on June 29, 2007.

2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:
 - Field measurements collected during groundwater sampling are provided in Attachment A.
 - Monitoring well casing elevations, water levels measured in Site monitoring wells and calculated potentiometric surface elevations are provided in Attachment B.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
 - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan (weather and access permitting) including:
 - Subtask 6.3 – Soil investigation – to be continued through soil sample analyses, analytical data validation, and data evaluation.
 - Subtask 6.5 – Groundwater/NAPL investigation -- to be continued through groundwater sample analyses, analytical data validation, and data evaluation.
 - Subtask 6.6 – Surface water investigation – to be continued through analytical data evaluation.
 - Subtask 6.7 – Sediment investigation – to be continued through analytical data evaluation.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 45% complete. The following delays were encountered this month:
 - The aforementioned denial of access to five of the ten background soil sampling locations has delayed soil investigation activities. With the collection of the five background soil samples within the City of Freeport right-of-way immediately south of Marlin Avenue as described above, this delay has been resolved. At present, it is uncertain how this delay will affect the overall schedule for completion of the RI/FS.

Mr. Gary Miller
July 13, 2007
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Thank you for the opportunity to submit this status report. Should you have any questions, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

A handwritten signature in black ink, appearing to read "Eric Pastor", written over a horizontal line.

Eric F. Pastor, P.E.
Principal Engineer

Attachments

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology
Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Robert L. Iuliucci - Sequa Corporation
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Rob Rouse - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP

ATTACHMENT A
GROUNDWATER SAMPLING
FIELD MEASUREMENTS

Gulfco Groundwater Field Parameters

<i>Station ID</i>	<i>Total Well Depth</i>	<i>Initial Water Level</i>	<i>Sample ID</i>	<i>Collection Date</i>	<i>Parameter</i>	<i>Parameter Value</i>	<i>Units</i>	<i>Remarks</i>
NB4MW18	18	17.08	NB4MW18	6/4/07	temperature	24.6	Celcius	
NB4MW18	18	17.08	NB4MW18	6/4/07	pH	7.17		
NB4MW18	18	17.08	NB4MW18	6/4/07	conductivity	50290	umhos/cm	
NB4MW18	18	17.08	NB4MW18	6/4/07	turbidity	1.6	NTU	
NB4MW18	18	17.08	NB4MW18	6/4/07	ORP	-27.3	mV	
NB4MW18	18	17.08	NB4MW18	6/4/07	DO	0.22	mg/L	
NC2MW28	15	2.57	NC2MW28	6/5/07	temperature	24.2	Celcius	
NC2MW28	15	2.57	NC2MW28	6/5/07	pH	6.98		
NC2MW28	15	2.57	NC2MW28	6/5/07	conductivity	70740	umhos/cm	
NC2MW28	15	2.57	NC2MW28	6/5/07	turbidity	111	NTU	
NC2MW28	15	2.57	NC2MW28	6/5/07	ORP	-23.7	mV	
NC2MW28	15	2.57	NC2MW28	6/5/07	DO	0.76	mg/L	
ND3MW29	17.5	3.79	ND3MW29	6/5/07	temperature	22.7	Celcius	
ND3MW29	17.5	3.79	ND3MW29	6/5/07	pH	6.17		
ND3MW29	17.5	3.79	ND3MW29	6/5/07	conductivity	53310	umhos/cm	
ND3MW29	17.5	3.79	ND3MW29	6/5/07	turbidity	18.4	NTU	
ND3MW29	17.5	3.79	ND3MW29	6/5/07	ORP	-26.9	mV	
ND3MW29	17.5	3.79	ND3MW29	6/5/07	DO	0.82	mg/L	
ND4MW24B	27	3.66	ND4MW24B	6/5/07	temperature	25.6	Celcius	
ND4MW24B	27	3.66	ND4MW24B	6/5/07	pH	7.18		

<i>Station ID</i>	<i>Total Well Depth</i>	<i>Initial Water Level</i>	<i>Sample ID</i>	<i>Collection Date</i>	<i>Parameter</i>	<i>Parameter Value</i>	<i>Units</i>	<i>Remarks</i>
ND4MW24B	27	3.66	ND4MW24B	6/5/07	conductivity	40720	umhos/cm	
ND4MW24B	27	3.66	ND4MW24B	6/5/07	turbidity	8.4	NTU	
ND4MW24B	27	3.66	ND4MW24B	6/5/07	ORP	-25.9	mV	
ND4MW24B	27	3.66	ND4MW24B	6/5/07	DO	0.24	mg/L	
NG3MW19	14	3.31	NG3MW19	6/6/07	temperature	24.5	Celcius	
NG3MW19	14	3.31	NG3MW19	6/6/07	pH	6.95		
NG3MW19	14	3.31	NG3MW19	6/6/07	conductivity	56110	umhos/cm	
NG3MW19	14	3.31	NG3MW19	6/6/07	turbidity	42	NTU	
NG3MW19	14	3.31	NG3MW19	6/6/07	ORP	-34.5	mV	
NG3MW19	14	3.31	NG3MW19	6/6/07	DO	0.27	mg/L	
NG3MW25B	27.5	2.99	NG3MW25B	6/6/07	temperature	24.7	Celcius	
NG3MW25B	27.5	2.99	NG3MW25B	6/6/07	pH	7.45		
NG3MW25B	27.5	2.99	NG3MW25B	6/6/07	conductivity	44910	umhos/cm	
NG3MW25B	27.5	2.99	NG3MW25B	6/6/07	turbidity	26	NTU	
NG3MW25B	27.5	2.99	NG3MW25B	6/6/07	ORP	-27.5	mV	
NG3MW25B	27.5	2.99	NG3MW25B	6/6/07	DO	0.36	mg/L	
OMW20	16	3.96	OMW20	6/4/07	temperature	23.9	Celcius	
OMW20	16	3.96	OMW20	6/4/07	pH	7.07		
OMW20	16	3.96	OMW20	6/4/07	conductivity	67480	umhos/cm	
OMW20	16	3.96	OMW20	6/4/07	turbidity	16	NTU	
OMW20	16	3.96	OMW20	6/4/07	ORP	-17.3	mV	
OMW20	16	3.96	OMW20	6/4/07	DO	0.27	mg/L	
OMW21	18.5	4.02	OMW21	6/4/07	temperature	24.7	Celcius	

<i>Station ID</i>	<i>Total Well Depth</i>	<i>Initial Water Level</i>	<i>Sample ID</i>	<i>Collection Date</i>	<i>Parameter</i>	<i>Parameter Value</i>	<i>Units</i>	<i>Remarks</i>
OMW21	18.5	4.02	OMW21	6/4/07	pH	7.13		
OMW21	18.5	4.02	OMW21	6/4/07	conductivity	70560	umhos/cm	
OMW21	18.5	4.02	OMW21	6/4/07	turbidity	564	NTU	
OMW21	18.5	4.02	OMW21	6/4/07	ORP	-117.6	mV	
OMW21	18.5	4.02	OMW21	6/4/07	DO	0.26	mg/L	
OMW27B	27.5	3.09	OMW27B	6/4/07	temperature	25.7	Celcius	
OMW27B	27.5	3.09	OMW27B	6/4/07	pH	9.54		
OMW27B	27.5	3.09	OMW27B	6/4/07	conductivity	32590	umhos/cm	
OMW27B	27.5	3.09	OMW27B	6/4/07	turbidity	6.6	NTU	
OMW27B	27.5	3.09	OMW27B	6/4/07	ORP	-13.1	mV	
OMW27B	27.5	3.09	OMW27B	6/4/07	DO	0.56	mg/L	
SA4MW22	15	5.36	SA4MW22	6/4/07	temperature	24.3	Celcius	
SA4MW22	15	5.36	SA4MW22	6/4/07	pH	7.07		
SA4MW22	15	5.36	SA4MW22	6/4/07	conductivity	50290	umhos/cm	
SA4MW22	15	5.36	SA4MW22	6/4/07	turbidity	4.7	NTU	
SA4MW22	15	5.36	SA4MW22	6/4/07	ORP	-17.7	mV	
SA4MW22	15	5.36	SA4MW22	6/4/07	DO	0.24	mg/L	
SF5MW10	22.4	5.72	SF5MW10	6/4/07	temperature	26.1	Celcius	
SF5MW10	22.4	5.72	SF5MW10	6/4/07	pH	7.04		
SF5MW10	22.4	5.72	SF5MW10	6/4/07	conductivity	21530	umhos/cm	
SF5MW10	22.4	5.72	SF5MW10	6/4/07	turbidity	27	NTU	
SF5MW10	22.4	5.72	SF5MW10	6/4/07	ORP	-12.9	mV	
SF5MW10	22.4	5.72	SF5MW10	6/4/07	DO	0.71	mg/L	

<i>Station ID</i>	<i>Total Well Depth</i>	<i>Initial Water Level</i>	<i>Sample ID</i>	<i>Collection Date</i>	<i>Parameter</i>	<i>Parameter Value</i>	<i>Units</i>	<i>Remarks</i>
SJ1MW15	20.5	4.17	SJ1MW15	6/4/07	temperature	25.1	Celcius	
SJ1MW15	20.5	4.17	SJ1MW15	6/4/07	pH	7.09		
SJ1MW15	20.5	4.17	SJ1MW15	6/4/07	conductivity	51790	umhos/cm	
SJ1MW15	20.5	4.17	SJ1MW15	6/4/07	turbidity	12	NTU	
SJ1MW15	20.5	4.17	SJ1MW15	6/4/07	ORP	-27.7	mV	
SJ1MW15	20.5	4.17	SJ1MW15	6/4/07	DO	0.28	mg/L	

ATTACHMENT B

**MONITORING WELL CASING ELEVATIONS,
WATER LEVEL FIELD MEASUREMENTS
AND POTENTIOMETRIC SURFACE ELEVATIONS**

Gulfco Water Levels - June 6, 2007

Well ID	Date	Time	MP Elevation (ft AMSL)	Depth to Water (ft BMP)	Water Elevation (ft AMSL)
ND2MW01	6/6/2007	1418	5.09	4.23	0.86
ND3MW02	6/6/2007	1456	6.41	4.59	1.82
ND4MW03	6/6/2007	1344	6.20	4.42	1.78
NE1MW04	6/6/2007	1403	4.90	4.12	0.78
NE3MW05	6/6/2007	1448	6.53	3.92	2.61
NF2MW06	6/6/2007	1356	5.35	4.06	1.29
SB4MW07	6/6/2007	1309	7.57	5.38	2.19
SE1MW08	6/6/2007	1318	7.54	5.37	2.17
SE6MW09	6/6/2007	1305	7.66	5.82	1.84
SF5MW10	6/6/2007	1251	8.01	5.79	2.22
SF6MW11	6/6/2007	1256	8.11	6.37	1.74
SF7MW12	6/6/2007	1301	7.96	6.52	1.44
SG2MW13	6/6/2007	1322	7.71	5.62	2.09
SH7MW14	6/6/2007	1244	8.10	6.02	2.08
SJ1MW15	6/6/2007	1226	5.61	4.09	1.52
SJ7MW16	6/6/2007	1234	7.19	5.16	2.03
SL8MW17	6/6/2007	1241	5.87	3.93	1.94
NB4MW18	6/6/2007	1542	4.96	16.32	-11.36
NG3MW19	6/6/2007	1443	5.08	3.58	1.50
OMW20	6/6/2007	1424	4.88	4.16	0.72
OMW21	6/6/2007	1409	5.73	4.17	1.56
SA4MW22	6/6/2007	1314	7.79	6.27	1.52
ND4MW24B	6/6/2007	1348	5.70	3.81	1.89
NG3MW25B	6/6/2007	1436	4.91	3.17	1.74
OMW27B	6/6/2007	1413	5.45	3.26	2.19
NC2MW28	6/6/2007	1430	4.76	2.83	1.93
ND3MW29	6/6/2007	1506	5.33	3.91	1.42
MW-1	6/6/2007	1520	6.75	4.17	2.58
MW-2	6/6/2007	1524	5.88	3.58	2.30
MW-3	6/6/2007	1529	7.23	5.34	1.89
HMW-1	6/6/2007	1521	5.15	2.89	2.26
HMW-2	6/6/2007	1513	4.69	3.93	0.76
HMW-3	6/6/2007	1517	5.20	3.78	1.42

Notes:

¹ MP = Measurement Point (Top of PVC well casing).

² AMSL = Above Mean Sea Level (NGVD 29).

³ BMP = Below Measurement Point.